

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709
VIRGINIA T. TOMOVA
Assistant United States Attorney
Nevada Bar Number 12504
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Virginia.Tomova@usdoj.gov
Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Aharon R. Guy and Bree Watson,

Plaintiffs,

v.

Merrick GARLAND, Attorney General
of the United States of America;
Alejandro MAYORKAS, Secretary of
Department of Homeland Security; Ur
M. JADDOU, Director U.S. Citizenship
and Immigration Services; Clyde
MOORE, Field Office Director, Las
Vegas Field Office U.S. Citizenship and
Immigration Services;

Defendants.

Case No. 2:22-cv-01896-JCM-DJA

Stipulation and Order

(First Request)

Plaintiffs Aharon R. Guy and Bree Watson, and United States of America, on behalf of Federal Defendants Merrick Garland, Attorney General of the United States of America, Alejandro Mayorkas, Secretary of Department of Homeland Security, Ur Jaddou, Director of U.S. Citizenship and Immigration Services, Clyde Moore, Field Office Director, Las Vegas Field Office U.S. Citizenship and Immigration Services ("Federal Defendants"), hereby stipulate and agree as follows:

Plaintiff filed their Complaint on November 9, 2022.

Plaintiff served the United States with a copy of the Summons and Complaint via Certified Mail on March 28, 2023.

1 The current deadline for the United States to respond to the Plaintiff's Complaint is
2 on May 30, 2023.

3 Plaintiff and the Federal Defendants, through undersigned counsel, stipulate and
4 request that the Court approve a 60-day extension of time, from May 30, 2023 to July 31,
5 2023, for Federal Defendants to file a response to the Complaint, ECF No. 1. This is the
6 first request for an extension of time.

7 The parties request this additional time to allow the undersigned AUSA to obtain all
8 necessary information from the agency and to engage in discussions directed at resolving
9 this matter, without the need for additional cost or further court intervention.

10 Therefore, the parties request that the Court extend the deadline for the United States
11 to answer or otherwise respond to July 31, 2023.

12 This stipulated request is filed in good faith and not for the purposes of undue delay.

13 Respectfully submitted this 26th day of May 2023.

14 LAW OFFICES OF PETER L. ASHMAN

JASON M. FRIERSON
United States Attorney

16 /s/ Peter L. Ashman
17 PETER L. ASHMAN, ESQ.
18 Nevada Bar No. 2285
617 S. 8th Street, Suite B
Las Vegas, Nevada 89101
19 *Attorney for Plaintiff*

/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney
Nevada Bar Number 12504
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101

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21 **IT IS SO ORDERED:**

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23 **UNITED STATES MAGISTRATE JUDGE**

24 **DATED:** 5/30/2023
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